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July 21, 2022

## VIA ECF ONLY

Hon. Robert W. Lehrburger, U.S.M.J. United States District Court Southern District of New York 500 Pearl Street, Room 1320 New York, New York 10007

Re: Covet & Mane, LLC v. Invisible Bead Extensions, LLC

Case No. 21-cv-07740-(JPC) (RWL)

Dear Magistrate Judge Lehrburger:

We represent defendant/counterclaim plaintiff Invisible Bead Extensions, LLC ("IBE") in connection with the above-captioned matter. On July 19, 2022, pursuant to Local Civil Rule 37.2 and Rule II(D) of Your Honor's Individual Practices in Civil Cases, plaintiff Covet & Mane, LLC ("C&M") filed a letter motion for a conference with the Court in advance of filing a motion compel the deposition of IBE's counsel, Robert Spendlove, Esq. (D.E. 87). Under Rule II(D), the deadline for IBE to file a responsive letter is this Friday, July 22, 2022. We write to the Court now to respectfully request a short extension of the time for IBE to respond to the letter motion to Tuesday, July 26, 2022.

Pursuant to Fed. R. Civ. P. 6(b)(1), IBE submits good cause exists for its requested extension of time. The undersigned counsel for IBE will be deposing C&M in this case on both July 21 and July 22, 2022, and can only first turn his attention to C&M's letter motion thereafter. IBE has not previously requested any extensions

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to file its response letter. Counsel for C&M has consented to this request for an extension.

We thank the Court for its continued attention to this matter.

Respectfully submitted,
MANDELBAUM BARRETT PC

Joel G. MacMull

cc: All Counsel of Record (via ECF only)

SO ORDERED:

7/21/2022

HON. ROBERT W. LEHRBURGER UNITED STATES MAGISTRATE JUDGE